

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

JERRY MCKINNEY, SR.

CIVIL ACTION NO. 1:19-CV-01339

VERSUS

JUDGE DRELL

RAPIDES PARISH SHERIFF'S  
OFFICE and SHERIFF WILLIAM  
EARL HILTON

MAG. JUDGE PEREZ-MONTES

**RESPONSES TO PLAINTIFF'S FOURTH SET OF DISCOVERY REQUESTS TO  
DEFENDANT SHERIFF WILLIAM EARL HILTON**

NOW COMES Defendant, SHERIFF WILLIAM EARL HILTON, who in answer and response to Plaintiff's Request For Admissions respectfully supplements as follows:

**REQUEST FOR ADMISSION NO. 55:**

Warden Batiste, whether or not he had authority to do so, allowed Jerry McKinney to work some number of eight-hour shifts rather than twelve-hour shifts. If McKinney had worked the twelve-hour shifts of his assigned position, rather than those eight-hour shifts, he would not have been terminated.

**RESPONSE:**

Admit.

Respectfully Submitted:

PROVOSTY, SADLER & deLAUNAY, APC

By: 

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ATTORNEYS FOR DEFENDANT,

WILLIAM EARL HILTON,

SHERIFF OF RAPIDES PARISH

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing RESPONSE TO PLAINTIFF'S FOURTH SET OF DISCOVERY TO DEFENDANT WILLIAM EARL HILTON has this day been served upon counsel for all parties hereto by placing a copy of same in the First Class United States Mail, postage prepaid and properly addressed and via E-mail on this the 8<sup>TH</sup> day of April, 2020.

Mr. David Lanser  
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OF COUNSEL

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EARL HILTON**

**MAG. JUDGE PEREZ-MONTES**

**VERIFICATION**

I, WILLIAM EARL HILTON, under the penalty of perjury, state that I am the duly elected Sheriff of Rapides Parish, Louisiana, and a Defendant herein in that capacity, in the case of "Jerry McKinney, Sr. v. Rapides Parish Sheriff's Office and Sheriff William Earl Hilton", Civil Action No. 1:19-CV-01339, in the United States District Court, Western Division of Louisiana, Alexandria Division, and that I have replied to the Plaintiff's Fourth Set of Discovery, as of this date, and that I certify that the information contained therein is true and accurate to the best of my current knowledge and belief.

Alexandria, Rapides Parish, Louisiana, this 8<sup>th</sup> day of April, 2020.

  
WILLIAM EARL HILTON, SHERIFF OF  
RAPIDES PARISH